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TRANSMITTAL OF APPEAL BRIEF (Large Entity)	Docket No. ITL.0554US
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Re Application Of: Ylian Saint-Hilaire, et al.

Application No.	Filing Date	Examiner	Customer No.	Group Art Unit	Confirmation No.
09/826,251	April 4, 2001	Lewis G. West	21906	2618	2672

Invention: Extending Personal Area Networks

COMMISSIONER FOR PATENTS:

Transmitted herewith in triplicate is the Appeal Brief in this application, with respect to the Notice of Appeal filed on
July 14, 2006

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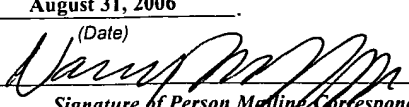
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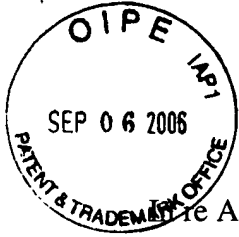

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:

Ylian Saint-Hilaire, et al.

Serial No.: 09/826,251

Filed: April 4, 2001

For: Extending Personal Area Networks

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Art Unit: 2618

Examiner: Lewis G. West

Atty Docket: ITL.0554US
(P11113)

Assignee: Intel Corporation

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APPEAL BRIEF

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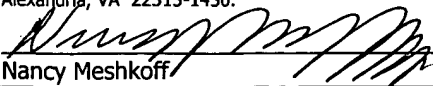
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Nancy Meshkoff

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REAL PARTY IN INTEREST

The real party in interest is the assignee Intel Corporation.

RELATED APPEALS AND INTERFERENCES

None.

STATUS OF CLAIMS

Claims 1-2 (Rejected).

Claim 3 (Canceled).

Claims 4-30 (Rejected).

Claims 1, 2, and 4-30 are rejected and are the subject of this Appeal Brief.

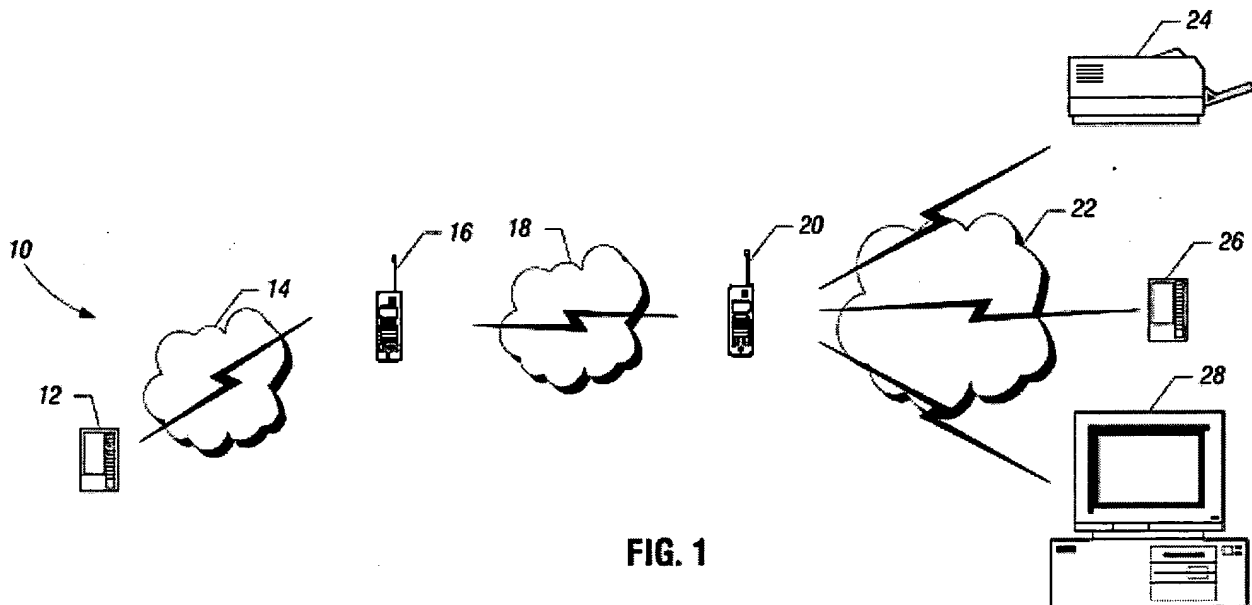
STATUS OF AMENDMENTS

All amendments have been entered.

SUMMARY OF CLAIMED SUBJECT MATTER

In the following discussion, the independent claims are read on one of many possible embodiments without limiting the claims:

1. A method comprising:
enumerating a plurality of devices (24, 26, 28, Figure 1) in a first radio frequency network (22, Figure 1) (Specification at page 8, lines 20-22);
communicating address information about the devices in said first radio frequency network (22) over a non-radio frequency network (18) to a second radio frequency network (14, Figure 1) (Specification at page 6, lines 9-11 and 17-20); and
making the address information about the devices in the first radio frequency network (22) available to devices in said second radio frequency network (14, Figure 1) (Specification at page 7, lines 1-22).

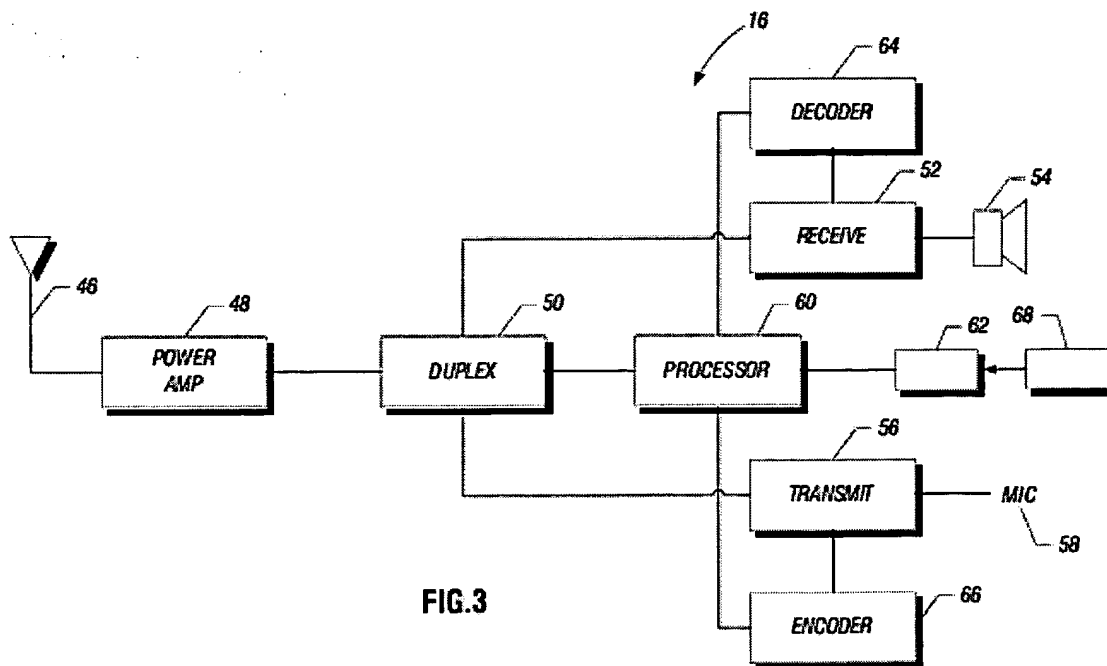


11. An article comprising a computer storage medium storing instructions that, if executed, enable a processor-based system to:
enumerate a plurality of devices (24, 26, 28, Figure 1) in a first radio frequency network (22, Figure 1) (Specification at page 8, lines 20-22);

communicate address information about the devices in said first radio frequency network (22) over a non-radio frequency network (18) to a second radio frequency network (14, Figure 1) (Specification at page 6, lines 9-11 and 17-20); and

make the address information about the devices in the first radio frequency network (22) available to devices in said second radio frequency network (14, Figure 1) (Specification at page 7, lines 1-22).

21. A device comprising:
a radio frequency receiver (Figure 3, 52);
a radio frequency transmitter (Figure 3, 56); and
a processor (Figure 3, 60) to enumerate devices in a first radio frequency network and to enumerate a plurality of devices (24, 26, 28, Figure 1) in a first radio frequency network (22, Figure 1) (Specification at page 8, lines 20-22), communicate address information about the devices in said first radio frequency network (22) over a non-radio frequency network (18) to a second radio frequency network (14, Figure 1) (Specification at page 6, lines 9-11 and 17-20), and make the address information about the devices in the first radio frequency network (22) available to devices in said second radio frequency network (14, Figure 1) (Specification at page 7, lines 1-22).



At this point, no issue has been raised that would suggest that the words in the claims have any meaning other than their ordinary meanings. Nothing in this section should be taken as an indication that any claim term has a meaning other than its ordinary meaning.

GROUND OF REJECTION TO BE REVIEWED ON APPEAL

- A. Are claims 1, 2, and 4-30 anticipated under 35 U.S.C. § 102(e) by Walley (U.S. Patent Publication No. 2002/0090961)?**

ARGUMENT

A. Are claims 1, 2, and 4-30 anticipated under 35 U.S.C. § 102(e) by Walley (U.S. Patent Publication No. 2002/0090961)?

Reversal is requested because the reference is being interpreted in a way which is inconsistent with both conventional usage of the term “network” and the usage of the applicant himself in the cited reference. This is plainly improper.

In the response to arguments on page 2 of the final rejection, it is suggested that in Walley there are multiple networks as each base station is capable of communicating with wireless, connected mobile devices. No support is cited for this proposition.

The proposition is surprising since it is directly inconsistent with what the inventor Walley describes. Walley is explicit that he has one and only one network. That network is the network 100 which he describes as including three bases, BS1, BS2, and BS3. *See* paragraph 26. Thus, the cited reference is directly contrary to the position taken by the Examiner. An interpretation of the reference, which is totally inconsistent with the reference itself, cannot be sustained.

The reference is explicit that all the base stations and the connected terminals are one network. For example, the cited application repeatedly talks about “the network” not “the networks”. To then simply take a subset of the elements and to define them as a network is inappropriate when, clearly, the one network is defined by convention and by the fact that all the devices within the network are enumerated.

In the case of Walley, it is clear that all the devices in Walley’s network are enumerated together. There is no enumeration separately for any two networks. Thus any device that is enumerated with the first network is part of the first network. That means that all the devices in Walley are part of the first network. As a result, as Walley explicitly explains, there is no second network in his system.

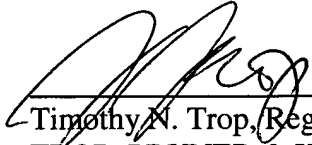
Walley never faces the problem of communicating address information between two different networks. He only has one network and whatever he communicates he communicates within that network. He does not have the problem that a first network has devices enumerated in it and a second network devices enumerated in it and the first and the second device networks have no way to know what devices are in the other network.

Since Walley does not teach a solution to the problem claimed and the assertion that Walley teaches distinct networks is irreconcilable with the reference itself, the rejection should be reconsidered.

Applicant respectfully requests that each of the final rejections be reversed and that the claims subject to this Appeal be allowed to issue.

Respectfully submitted,

Date: August 31, 2006



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CLAIMS APPENDIX

The claims on appeal are:

1. A method comprising:
enumerating a plurality of devices in a first radio frequency network;
communicating address information about the devices in said first radio frequency network over a non-radio frequency network to a second radio frequency network; and
making the address information about the devices in the first radio frequency network available to devices in said second radio frequency network.
2. The method of claim 1 including automatically enumerating a plurality of devices in a Bluetooth radio frequency network.
4. The method of claim 1 including communicating information about said first radio frequency network over a telephone network.
5. The method of claim 1 including enumerating a plurality of devices in a second radio frequency network.
6. The method of claim 5 including combining said first and second radio frequency networks into a combined radio frequency network.
7. The method of claim 6 including enabling any device in said first radio frequency network to communicate through a telephone call with any device in said second radio frequency network.
8. The method of claim 7 including transmitting data between said first and second radio frequency networks through said telephone call at the same time that a voice communication is ongoing between a device in said first radio frequency network and a device in said second radio frequency network.

9. The method of claim 8 including enumerating a cellular telephone as said first and second telephones.

10. The method of claim 9 wherein one of said cellular telephones acts as a proxy for the devices in said first radio frequency network and the other of said cellular telephones acts as a proxy for the devices in said second radio frequency network.

11. An article comprising a computer storage medium storing instructions that, if executed, enable a processor-based system to:

enumerate a plurality of devices in a first radio frequency network;
communicate address information about the devices in said first radio frequency network over a non-radio frequency network to a second radio frequency network; and
make the address information about the devices in the first radio frequency network available to devices in said second radio frequency network.

12. The article of claim 11 further storing instructions that enable the processor-based system to automatically enumerate a plurality of devices in a Bluetooth radio frequency network.

13. The article of claim 11 further storing instructions that enable the processor-based system to develop enumeration data for a plurality of devices in a first radio frequency network and communicate that enumeration data over a non-radio frequency network.

14. The article of claim 13 further storing instructions that enable the processor-based system to develop communications about said first radio frequency network over a telephone network.

15. The article of claim 11 further storing instructions that enable the processor-based system to receive enumeration data from a plurality of devices in a second radio frequency network coupled to said first radio frequency network by said non-radio frequency network.

16. The article of claim 15 further storing instructions that enable said processor-based system to combine said first and second radio frequency network enumeration data to develop a combined radio frequency network.

17. The article of claim 16 further storing instructions that enable the processor-based system to enable any device in said first radio frequency network to communicate with any device in said second radio frequency network.

18. The article of claim 17 further storing instructions that enable the processor-based system to transmit data from said first to said second radio frequency network via said call at the same time that a voice communication is ongoing between a device in said first radio frequency network and a device in said second frequency network.

19. The article of claim 18 further storing instructions that enable the processor-based system to implement cellular radio frequency communications.

20. The article of claim 19 further storing instructions that enable a cellular telephone in said first radio frequency network to act as a proxy for other devices in said first radio frequency network.

21. A device comprising:
a radio frequency receiver;
a radio frequency transmitter; and
a processor to enumerate devices in a first radio frequency network and to enumerate a plurality of devices in a first radio frequency network, communicate address information about the devices in said first radio frequency network over a non-radio frequency network to a second radio frequency network, and make the address information about the devices in the first radio frequency network available to devices in said second radio frequency network.

22. The device of claim 21 wherein said radio frequency transmitter includes a cellular radio frequency transmitter.

23. The device of claim 22 wherein said transmitter includes a Bluetooth transmitter.

24. The system of claim 21 including a transmitter to transmit information over at least two different radio frequency networks as well as a telephone network.

25. The device of claim 24 including a transmitter to transmit over a cellular telephone network and a Bluetooth network.

26. The device of claim 21 wherein said processor is programmed to receive enumeration data over a non-radio frequency network so as to combine the first radio frequency network with a second radio frequency network over said non-radio frequency network.

27. The device of claim 21 including a receiver and a transmitter to implement a telephone link while simultaneously exchanging data received over a separate radio frequency link.

28. The device of claim 21 wherein said transmitter packetizes voice data.

29. The device of claim 28 wherein said transmitter packetizes enumeration data and transmits it with packetized voice data.

30. The device of claim 29 wherein said device is a Bluetooth and cellular transceiver.

EVIDENCE APPENDIX

None.

RELATED PROCEEDINGS APPENDIX

None.